

## REMARKS

### 35 U.S.C. § 112 Rejections

The Examiner has rejected claims 1-8 and 10-12 under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. The Examiner states that the “chassis-level fluid” and “frame-level fluid” were not described in the specification. Applicant respectfully disagrees. Paragraph [0031] at line 2 refers to a computer chassis 54. Paragraphs [0031] to [0038] refer to various components of the computer chassis. These components are thus chassis-level components. Paragraphs [0042] and [0043] describe how a fluid flows through the chassis-level components. This fluid is thus a chassis-level fluid. Paragraph [0022], at line 2, refers to a frame-level thermal interface component 28. Paragraph [0051] describes how a fluid flows over the frame-level interface component 28. The fluid is thus a frame-level fluid. It should be noted that the terms “chassis-level” and “frame-level” are merely labels that are used to distinguish one fluid from another.

Applicant, accordingly, submits that claims 1-8 and 10-12 comply with the written description requirement, and respectfully requests withdrawal of the rejections of these claims under 35 U.S.C. § 112, first paragraph.

The Examiner also rejected claims 1-8 and 10-12 under 35 U.S.C. § 112, second paragraph, because the claims do not particularly point out and distinctly claim the subject matter which Applicant regards as the invention. The Examiner

states that there is insufficient antecedent basis for the limitation “the thermal fluid.” This limitation has been amended to read “the chassis-level fluid,” for which there is sufficient antecedent basis. Applicant, accordingly, respectfully requests withdrawal of the rejections of claims 1-8 and 10-12 under 35 U.S.C. § 112, second paragraph.

#### 35 U.S.C. § 102 Rejections

The Examiner has rejected claims 1-7 and 16-18 under 35 U.S.C. § 102(e) as being anticipated by Pautsch. Applicant submits that these claims, especially as amended, are not anticipated by Pautsch.

Pautsch in Figure 1 illustrates a board with a plurality of chip modules 14 mounted thereon. The board is held horizontally, and the chip modules 14 are all located in a horizontal plane parallel to the board. What Pautsch does not disclose is a rack-based system. As such, Pautsch does not disclose a support frame having left and right vertically extending supports, a plurality of left side rails and a plurality of right side rails on the left and right supports, respectively, and a plurality of chassis removably inserted above one another into the frame, each chassis being held by a respective left side rail and a respective right side rail.

Claim 1 has been amended to include the limitation that the computer system includes a support frame having left and right vertically extending supports, a plurality of left side rails and a plurality of right side rails on the left and right supports respectively, and a plurality of chassis removably inserted

above one another into the frame, each chassis being held by a respective left side rail and a respective right side rail. Claim 1 thus includes at least one limitation that is not disclosed in Pautsch.

Applicant, accordingly, respectfully requests withdrawal of the rejections of claims 1-7 and 16-18 under 35 U.S.C. § 102(e) as being anticipated by Pautsch.

#### 35 U.S.C. § 103 Rejections

The Examiner has rejected claim 8 under 35 U.S.C. § 103(a) as being unpatentable over Pautsch in view of Bilski, et al. Some of the limitations of this claim have been included in claim 1, and claim 8 has been deleted. Neither Pautsch nor Bilski discloses how heat from different chassis in a rack-based system can be transferred to a single fluid.

The Examiner also rejected claim 12 under 35 U.S.C. § 103(a) as being unpatentable over Pautsch in view of Konstad. This claim depends from claim 1, and should be allowable for at least the same reasons as claim 1.

#### Allowable Subject Matter and New Claim

The Examiner indicated that claims 10-12 are objected to as being dependent on a rejected base claim, but would be allowable if rewritten in independent form, including all the limitations of the base claim and any intervening claims. New claim 19 has been added. Claim 19 substantially

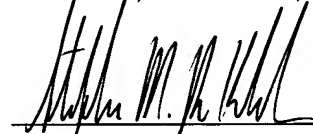
conforms to claim 10, including all the limitations of the base claim and any intervening claims.

Applicant respectfully submits that the present application is in condition for allowance. If the Examiner believes a telephone conference would expedite or assist in the allowance of the present application, the Examiner is invited to call Stephen M. De Klerk at (408) 720-8300.

Please charge any shortages and credit any overages to Deposit Account No. 02-2666. Any necessary extension of time for response not already requested is hereby requested. Please charge any corresponding fee to Deposit Account No. 02-2666.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP



Stephen M. De Klerk  
Reg. No. 46,503

Date: February 24, 2004

12400 Wilshire Boulevard  
Seventh Floor  
Los Angeles, California 90025-1026  
(408) 720-8300